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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

QUINCY KRASHNA,

Defendant.

Case No.: CR 17–22 JSW

**DEFENDANT’S REPLY TO
GOVERNMENT’S RESPONSE TO
MOTION FOR COMPASSIONATE
RELEASE AND [PROPOSED] ORDER
GRANTING COMPASSIONATE
RELEASE**

Court: Courtroom 5, 2nd Floor

Hearing Date: June 16, 2020

Hearing Time: 1:00 p.m.

The government does not oppose Quincy Krashna’s motion to reduce his term of imprisonment to time served (Dkt. 40), but requests the Court stay the order granting release until June 18; order that Mr. Krashna be quarantined for two weeks prior to his release; impose, as a condition of release, home confinement until September 5, 2020; and impose, as a condition of release, that Mr. Krashna must abide by all court orders. Dkt. 47. Mr. Krashna, through counsel, does not oppose the government’s requests except to the extent that proposed conditions of release unduly restrict his right to familial association or are unconstitutionally vague. *See United States v. Dominguez*, No. 18-

1 50360, 2020 WL 2844530, at *2 (9th Cir. June 1, 2020) (vacating special conditions of release
2 implicating defendant's right to familial association); *United States v. Hall*, 912 F.3d 1224, 1226–27
3 (9th Cir. 2019) (per curiam).

4 Additionally, if Santa Rita Jail is unable to quarantine Mr. Krashna for the full two-week period
5 prior to June 18, Mr. Krashna should be permitted to satisfy his two-week self-quarantine at home.
6 *See United States v. Fischman*, No. 16-CR-00246-HSG-1, 2020 WL 2097615, at *3 (N.D. Cal. May
7 1, 2020) (permitting defendant to satisfy 14-day self-quarantine requirement at home).

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10 Dated: June 3, 2020

Respectfully submitted,

11 STEVEN G. KALAR
12 Federal Public Defender
Northern District of California

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JOYCE LEAVITT
Assistant Federal Public Defender
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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
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UNITED STATES OF AMERICA,

Plaintiff,

v.

QUINCY KRASHNA,

Defendant.

Case No.: CR 17–22 JSW

**[PROPOSED] ORDER GRANTING
COMPASSIONATE RELEASE**

Court: Courtroom 5, 2nd Floor

For good cause shown, the Court hereby GRANTS the motion for compassionate release. *See* Dkt. 40. Quincy Krashna’s sentence of imprisonment is modified to time served, effective on June 18, 2020. Mr. Krashna’s custodian at Santa Rita Jail shall place Mr. Krashna in quarantine on or before June 5, 2020, so that Mr. Krashna may serve a 14-day period of quarantine before his release. Mr. Krashna is to be released from custody on June 18, 2020. The government shall serve a copy of this Order on Santa Rita Jail immediately.

Mr. Krashna shall complete the three-year term of supervised release imposed in the original sentence subject to the original conditions, *see* Dkt. No. 37, except Standard Condition No. 8 (requiring at least part-time employment), and with the following additional special conditions:

- Mr. Krashna shall be subject to home confinement, without electronic monitoring, at his home in Albany, California, until September 5, 2020. Mr. Krashna may only leave his residence for necessary medical services or for necessities like toiletries or groceries, with the prior approval of the Probation Office, except in the case of medical emergencies.
- Mr. Krashna shall be abide by all court orders.

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4 IT IS SO ORDERED.
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6 Dated: _____

7 JEFFREY S. WHITE
8 United States District Judge
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